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ORIGINAL

MAY 28 2014

JAMES N. HATTEN, Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

By: *[Signature]* Deputy Clerk

UNITED STATES OF AMERICA

v.

NATENAEL ZEYID
ISMAIL ALI KHAN
AHMED ALI KHAN
ARBAB SALIM
HARDIK KUMAR DESAI

Criminal Indictment

No.

1:14-CR-0197

THE GRAND JURY CHARGES THAT:

Count 1

Title 18, United States Code, Section 371
The Conspiracy and Its Objects

1. Beginning on or before November 19, 2007, and continuing through the date of the return of this indictment, in the Northern District of Georgia and elsewhere, the defendants, NATENAEL ZEYID, ISMAIL ALI KHAN, AHMED ALI KHAN, ARBAB SALIM, and HARDIK KUMAR DESAI, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with each other and with other persons known and unknown to the grand jury, to commit offenses against the United States, to wit:

a) with the intent to defraud and mislead, causing the introduction into interstate commerce of drugs that were misbranded within the meaning of the Food, Drug, and Cosmetic Act in violation of Title 21 United States Code, Sections 331(a), 333(a)(2), 352(a), 352(c), and 352(f).

b) fraudulently and knowingly importing and bringing into the United States merchandise contrary to law, and receiving, concealing, buying, selling, and facilitating the transportation, concealment, and sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law. The importing and bringing the misbranded drugs and dietary supplements into the United States was contrary to Title 18, United States Code, § 542, in that the defendants and their co-conspirators entered and introduced into the commerce of the United States imported merchandise by means of fraudulent and false invoices, declarations, affidavits, letters, and papers, and by procuring the making of false statements as to matters material thereto without reasonable cause to believe the truth of such statements, whether or not the United States was deprived of any lawful duties, and attempting to do so. The importing and bringing the misbranded drugs and dietary supplements into the United States was also contrary to Title 21, United States Code, Section 331(a), 352(a), 352(c), and 352(f), in that the defendants and their co-conspirators with the intent to defraud and mislead, caused the introduction into interstate commerce of drugs and dietary supplements that were misbranded within the meaning of the Food, Drug, and Cosmetic Act. All in violation of Title 18, United States Code, Section 545.

Manner and Means of the Conspiracy

2. The overriding purpose of the conspiracy was to import, in a manner contrary to law, misbranded drugs and dietary supplements marketed under

names including "Maxman," "Herb Viagra," "Rock Hard Weekend," "Stiff Nights," "Happy Passengers," "Hard Ten Days" "Zhen Gongfu" and others and to sell those products to customers throughout the United States and elsewhere.

3. To that end, it was part of conspiracy that defendants would purchase misbranded drugs and dietary supplements from suppliers in China and elsewhere. The misbranded drugs and dietary supplements would arrive in the Northern District of Georgia packaged and ready for distribution to consumers.

4. It was further part of the conspiracy that defendants would hold large inventories of misbranded drugs and dietary supplements in rented storage units.

5. To evade detection by authorities, defendants took measures to operate in a covert manner. For example, it was part of the conspiracy that defendants rented multiple storage units at different locations at the same time. Defendants, for no legitimate business reason, would vacate a storage unit after only a few months and rent a new one. Defendants followed the same pattern with mail boxes, opening and closing units at different locations throughout the Atlanta area. It was also part of the conspiracy for defendants to use aliases, false addresses, and fake business names, and to misrepresent the nature of their business when renting storage units and mail boxes.

6. Also to avoid detection and prevent United States Customs authorities from intercepting the misbranded drugs and dietary supplements, defendants' suppliers would purposefully misdeclare the goods on forms reviewed by United States Customs authorities. Drugs and dietary supplements would be

fraudulently declared as innocuous items—like “tea,” “coffee,” and “beauty products”—so as not to provoke regulatory scrutiny.

7. It was part of the conspiracy that some of the drugs and dietary supplements contained active pharmaceutical ingredients, like sildenafil, the active ingredient in Viagra. These products were misleadingly marketed as “all-natural” and “herbal.” The active pharmaceutical ingredient would be omitted from the product’s label, misleading consumers about the true nature of the product.

8. It was part of the conspiracy that AHMED ALI KHAN would wire transfer payments for illegally imported merchandise to bank accounts in China.

Overt Acts

9. In furtherance of the conspiracy and to effect the objects and purposes thereof, the defendants and others known and unknown, committed or caused to be committed the following overt acts, among others, in the Northern District of Georgia and elsewhere:

10. On or about January 2, 2014, NATENAEL ZEYID, opened mailbox #122 at the UPS store located at 2550 Sandy Plains Road, suite 225, Marietta, GA 30066. ZEYID listed his address as 2325 Skylars Mill Way, Snellville, GA 30078 and his phone number as 404-483-2379. ZEYID listed a fake business name of “Leon” and “electronics” as the type of business. Defendants thereafter began receiving drugs and dietary supplements from China at this location that were falsely declared as “coffee” and “tea.”

11. On or about January 2, 2014, NATENAEL ZEYID, also opened mailbox #405 at the UPS store located at 50 Barrett Parkway, suite 3005, Marietta, GA 30066. ZEYID listed his address as 2325 Skylars Mill Way, Snellville, GA 30078 and his phone number as 404-483-2379. ZEYID listed a fake business name of "Leon" and "Electronics Repair" as the type of business. Defendants thereafter began receiving drugs and dietary supplements from China at this location that were falsely declared as "coffee" and "tea."

a. On or about May, 05, 2014, defendants caused the dietary supplement "Man Up Now" to be shipped to mailbox #405 from China. To evade detection by United States Customs authorities, the products were falsely declared as "tea."

12. On or about January 2, 2014, NATENAEL ZEYID, also opened mailbox # 343 at the UPS store located at 3595 Canton Road, suite 116, Marietta, GA 30066. ZEYID listed his address as 2325 Skylars Mill Way, Snellville, GA 30078 and his phone number as 404-483-2379. ZEYID listed a fake business name of "Leon" on the application. Defendants thereafter began receiving drugs and dietary supplements from China at this location that were falsely declared as "tea."

13. On or about April 1, 2013, ISMAIL ALI KHAN, rented mailbox # 136 at the UPS store located at 1425 Market Blvd., suite 330, Roswell, GA 30076. KHAN listed his home address as 325 Valleybrook Xing, Decatur, GA 30033 and his phone # as 404-503-6308. KHAN listed a fake business name of "Maniyar Inc" and "general merchandise" as the type of business.

14. Thereafter, defendants began receiving drugs and dietary supplements at mailbox #136. To evade detection by United States Customs authorities, the drugs and dietary supplements were falsely declared as "beauty products" and "tea."

15. On or about April 1, 2013, ISMAIL ALI KHAN also rented mailbox # 502 at the UPS store located at 10945 State Bridge Road, suite 401, Alpharetta, GA 30022. KHAN listed his home address as 307 Valleybrook Xing, Decatur, GA 30033 and his phone # as 404-503-6308. KHAN used a fake business name of "Lakshmi LLC" and listed "general merchandise" as the type of business. Defendants thereafter began receiving drugs and dietary supplements from China at this location that were falsely declared as "beauty products."

a. On or about June 13, 2013, defendants caused the dietary supplement "ExtenZen" to be shipped to mailbox #502 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "Beauty Products."

b. On or about August 22, 2013, defendants caused the dietary supplement "Stiff Nights" to be shipped to mailbox #502 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "beauty products."

16. On or about April 1, 2013, ISMAIL ALI KHAN also rented mailbox # 233 at the UPS store located at 3000 Old Alabama Road, suite 119, Alpharetta, GA 30022. KHAN listed his home address as 307 Valleybrook Xing, Decatur, GA 30033 and his phone number as 404-503-6308. KHAN listed a fake business

name "Ziya Inc" on the application. Defendants thereafter began receiving drugs and dietary supplements at this location that were falsely declared as beauty products.

a. On or about April 18, 2013, defendants caused the drug "Zhen Gongfu" to be shipped to mailbox #233 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "beauty products."

17. On or about January 21, 2013, AHMED ALI KHAN opened mailbox # 3 at the UPS store located at 3904 North Druid Hills Road, Decatur, GA 30033. KHAN listed his home address as 307 Valleybrook Xing, Decatur, GA 30033 and his phone number as 404-717-6144. Defendants thereafter began receiving drugs and dietary supplements at this location that were falsely declared as beauty products.

a. On or about June 13, 2013, defendants caused the dietary supplement "Nite Rider" to be shipped to mailbox #3 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "beauty products."

b. On or about August 16, 2013, defendants caused the drug "Rock Hard Weekend" to be shipped to mailbox #3 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "beauty products."

18. On or about March 12, 2013, ARBAB SALIM opened mailbox #311 at the UPS store located at 375 Rockbridge Road, Suite 172, Lilburn, GA 30047. SALIM listed his home address as 1597 Woodbend Drive, Stone Mountain, GA 30083

and his phone number as 678-458-0154. SALIM listed a business name of "Maniyar Inc" and "general merchandise" as the type of business. Defendants thereafter began receiving drugs and dietary supplements from China at mailbox #311 that were falsely declared as "coffee" and "beauty products."

a. On or about June 14, 2013, defendants caused the dietary supplement "Nite Rider" to be shipped to mailbox #311 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "beauty products."

b. On or about October 31, 2013, defendants caused the dietary supplement "Stiff Nights" to be shipped to mailbox #311 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "coffee."

19. On or about March 13, 2013, ARBAB SALIM opened # 307 at the UPS store located at 2566 Shallowford Road, suite 104, Atlanta, GA 30345. SALIM listed his address as 307 Valleybrook Xing, Decatur, GA 30033 and his phone # as 404-503-6308. SALIM listed a fake business name of "Maniyar Inc." and "Beauty Supplies" as the type of business. Defendants thereafter began receiving drugs and dietary supplements from China at mailbox #307 that were falsely declared as "pottery" and "beauty products."

a. On or about April 24, 2013, defendants caused the drug "Hard Ten Days" to be shipped to mailbox #307 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "pottery."

20. On or about May 25, 2013, ARBAB SALIM opened mailbox # 259 at the UPS store located at 3535 Peachtree Road, suite 520, Atlanta, GA 30326. SALIM listed his home address as 307 Valleybrook Xing, Decatur, GA 30033 and his phone number as 404-503-6308. SALIM listed a fake business name of "Dhoni and Dravid" on the application. Defendants thereafter began receiving drugs and dietary supplements at this location from China that were falsely declared as "coffee," "tea," and "beauty products."

a. On or about August 22, 2013, defendants caused the drug "African Black Ant" to be shipped to mailbox #259 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "Beauty Products."

b. On or about October 31, 2013, defendants caused the dietary supplement "Libigrow" to be shipped to mailbox #259 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "coffee."

21. On or about May 25, 2013, ARBAB SALIM also opened mailbox # 515 at the UPS store located at 3522 Ashford Dunwoody Road, Atlanta, GA 30319. SALIM listed his home address as 1438 Montreal Road, Tucker, GA 30084 and his phone number as 404-503-6308. SALIM listed a fake business name as "Dravid" and the type of business as "beauty products." Defendants thereafter began receiving drugs and dietary supplements from China that were falsely declared as "beauty products" and "tea."

a. On or about October 31, 2013, defendants caused the dietary supplement, "Control-Natural Sexual Enhancement" to be sent from China to box #515. To

evade detection by United States Customs officials, the dietary supplement was falsely declared as "tea."

22. On or about August 14, 2013, ARBAB SALIM opened mailbox # 229 at the UPS store located at 1227 Rockbridge Road, suite 208, Stone Mountain, GA 30087. SALIM listed his home address as 1597 Wood Bend Drive, Stone Mountain, GA 30083 and his phone # 404-503-6308. SALIM listed a fake business name of "Landstar LLC" and the type of business as "Beauty Products." Defendants thereafter began receiving drugs and dietary supplements at this location from China that were falsely declared as "coffee."

23. On or about August 16, 2013 ARBAB SALIM opened mailbox # 169 at the UPS store located at 4002 Hwy 78, suite 530, Snellville, GA 30039. SALIM listed his home address as 2915 E. Ponce de Leon, Decatur, GA and his phone # as 404-503-6308. SALIM listed a fake business name as "Eagle LLC" and the type of business as "Beauty Products/Novelties." Defendants thereafter began receiving drugs and dietary supplements at this location from China under false declarations as "coffee."

a. On or about November 14, 2013, defendants caused the dietary supplement "Libigrow" to be shipped to mailbox #169 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "coffee."

b. On or about November 20, 2013, defendants caused the drug "Stree Overlord" to be shipped to mailbox #169 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "coffee."

24. Also on or about August 16, 2013, ARBAB SALIM opened mailbox # 472 at the UPS located at 3050 Five Forks Trickum Road, suite D, Lilburn, GA 30047. SALIM listed his home address as 2915 E. Ponce de Leon, Decatur, GA 30033 and his phone number as 678-458-0154. SALIM listed a fake business name of "Solar LLC" on the application. Defendants thereafter began receiving drugs and dietary supplements at this location from China under false declarations as "tea."

a. On or about October 31, 2013, defendants caused the drug "Blue Diamond" to be shipped to mailbox # 472 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "tea."

b. Also on or about October 31, 2013, defendants caused the dietary supplement "Control-Natural Sexual Enhancement" to be shipped to mailbox # 472 from China. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "tea."

c. On or about November 6, 2013, defendants caused the drug "Herb Viagra" to be shipped to mailbox # 472 from China. To evade detection by United States Customs authorities, the drug was falsely declared as "tea."

25. On or about September 23, 2013, HARDIK KUMAR DESAI opened mailbox # 220 at the UPS store located at 3588 Hwy 138, Stockbridge, GA 30281. DESAI listed his address as 325 Valleybrook Crossing, Decatur, GA and his phone number as 404-936-0506. DESAI listed a fake business name of Union LLC on the application. Beginning on or about the same time, defendants caused to be shipped to mailbox #220 drugs and dietary supplements that were misdeclared to United States Customs officials as "tea" and "coffee."

a. On or about October 23, 2013, defendants caused the dietary supplement "Maxman" to be shipped to mailbox #220. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "tea."

b. On or about October 23, 2013, defendants caused the drug "Herb Viagra" to be shipped to mailbox #220. To evade detection by United States Customs authorities, the drug was falsely declared as "tea."

26. On or about September 23, 2013, HARDIK KUMAR DESAI opened mailbox # 130 at the UPS store located at 2045 Mt. Zion Road, Morrow, GA 30260. DESAI listed his home address as 325 Valleybrook Xing, Decatur, GA and his phone # as 404-936-0506. DESAI listed a fake business name of DDAy LLC and the type of business as "Beauty Products." Beginning on or about the same time, the defendants caused to be shipped to mailbox #130 drugs and dietary supplements that were misdeclared to United States Customs officials as "coffee."

a. On or about November 14, 2013, defendants caused the drug "Stree Overlord" to be shipped to mailbox #130. To evade detection by United States Customs authorities, the drug was falsely declared as "coffee."

27. On or about September 24, 2013, HARDIK KUMAR DESAI opened mailbox # 245 at the UPS store located at 950 Eagles Landing Parkway, Stockbridge, GA 30281. DESAI listed his home address as 582 Roberts Drive, apt 82, Riverdale, GA 30274 and his phone # as 404-936-0506. Defendants thereafter received drugs and dietary supplements at this location from China that were falsely declared as "tea" and "coffee."

a. On or about October 31, 2013, defendants caused the dietary supplement "Libigrow" to be shipped to mailbox #245. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "tea."

b. On or about November 6, 2013, defendants caused the dietary supplement "Man Up Now" to be shipped to mailbox #245. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "tea."

c. On or about November 20, 2013 defendants caused the dietary supplement "Control-Natural Male Enhancement" to be shipped to mailbox #245. To evade detection by United States Customs authorities, the dietary supplement was falsely declared as "tea."

28. On or before January 12, 2012, defendants caused the drugs "Happy Passengers" to be shipped from China to an address they controlled. The drugs contained sildenafil (the active pharmaceutical ingredient in Viagra), diazepam (the active pharmaceutical ingredient in Valium), and doxepine (the active pharmaceutical ingredient in Silenor).

29. On or before May 30, 2013, defendants caused the drug "Rock Hard Weekend" to be shipped from China to an address they controlled. The drug contained sildenafil (the active pharmaceutical ingredient in Viagra).

30. On or about November 19, 2007, AHMED ALI KHAN opened Paypal account # *****1234. Between November 19, 2007 and December 6, 2013, KHAN sent \$316,169.99 through this PayPal account. Most of the money was transferred to bank accounts in China.

31. On or about March 26, 2008, AHMED ALI KHAN opened a second PayPal account # *****3212 and between March 26, 2008 and December 6, 2013, KHAN sent \$1,648,105.52 through this PayPal account. This money was similarly transferred to bank accounts in China.

32. During the course of the conspiracy, defendants received and willfully ignored approximately 55 written notifications from the Food and Drug Administration stating that drugs and dietary supplements ordered by defendants had been detained at the border and were illegal to import.

All in violation of Title 18, United States Code, Section 371.

Count 2

Title 21, United States Code, Sections 331(a), 333(a)(2), 352(c), and 352(f) Introducing Misbranded Drugs into Interstate Commerce

33. Paragraphs 1-32 of this indictment are realleged and incorporated by reference into each count below.

34. On or about the date listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN and AHMED ALI KHAN, aided and abetted by each other and others, with the intent to defraud and mislead, caused the introduction into interstate commerce of a quantity of drugs described below that were misbranded within the meaning of the Food, Drug, and Cosmetic Act in that:

Count	Name	Imported on or about	From/to	Misbranded under
2	Happy Passengers (drug)	January 12, 2012	China/location within N.D. Ga. (¶28)	21 U.S.C. §§ 352(a), (c), and (f)

All in violation of Title 21, United States Code, Sections 331(a), 352(a), 352(c), 352(f), 333(a)(2) and Title 18, United States Code, Section 2.

Counts 3 and 4

Title 21, United States Code, Sections 331(a), 333(a)(2), 352(c), and 352(f) Introducing Misbranded Drugs into Interstate Commerce

35. Paragraphs 1-32 of this indictment are realleged and incorporated by reference into each count below.

36. On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN, AHMED ALI KHAN, and ARBAB SALIM, aided and abetted by each other and others, with the intent to defraud and mislead, caused the introduction into interstate commerce of a quantity of drugs described below that were misbranded within the meaning of the Food, Drug, and Cosmetic Act in that:

Count	Name	Imported on or about	From/to	Misbranded under
3	Zhen Gongfu (drug)	April 18, 2013	China/Mailbox #233 (¶ 16.a)	21 U.S.C. §§ 352(c) and (f)
4	Hard Ten Days (drug)	April 24, 2013	China/Mailbox #307 (¶ 19.a)	21 U.S.C. §§ 352(c) and (f)

All in violation of Title 21, United States Code, Sections 331(a), 352(a), 352(c), 352(f), 333(a)(2) and Title 18, United States Code, Section 2.

Count 5 and 6Title 21, United States Code, Sections 331(a), 333(a)(2), 352(c), and 352(f)
Introducing Misbranded Drugs into Interstate Commerce

37. Paragraphs 1-32 of this indictment are realleged and incorporated by reference into each count below.

38. On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN, AHMED ALI KHAN, ARBAB SALIM, and HARDIK KUMAR DESAI, aided and abetted by each other and others, with the intent to defraud and mislead, caused the introduction into interstate commerce of a quantity of drugs described below that were misbranded within the meaning of the Food, Drug, and Cosmetic Act in that:

Count	Name	Imported on or about	From/to	Misbranded under
5	Herb Viagra (drug)	October 23, 2013	China/Mailbox #220 (¶25.b)	21 U.S.C. §§ 352(c) and (f)
6	Herb Viagra (drug)	November 6, 2013	China/Mailbox #472 (¶ 24.c)	21 U.S.C. §§ 352(c) and (f)

All in violation of Title 21, United States Code, Sections 331(a), 352(a), 352(c), 352(f), 333(a)(2) and Title 18, United States Code, Section 2.

Count 7Title 18, United States Code, Section 545
Illegal importation

39. Paragraphs 1-32 of this indictment and realleged and incorporated by reference in this count.

40. On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN and AHMED ALI KHAN, aided and abetted by and aiding and abetting each other, fraudulently and knowingly imported and brought into the United States, and caused to be imported and brought into the United States, merchandise contrary to law, and received, concealed, bought, sold, and facilitated the transportation, concealment, and sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law.

Count	Name	Imported on or about	From/to	Misbranded under	Falsely declared as
7	Happy Passengers (drug)	January 12, 2012	China/ location within N.D. Ga. (¶28)	21 U.S.C. §§ 352(a), (c), and (f)	

All in violation of Title 18, United States Code, Sections 545 and 2.

Counts 8 and 9

Title 18, United States Code, Section 545

Illegal importation

41. Paragraphs 1-32 of this indictment and realleged and incorporated by reference in this count.

42. On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN, AHMED ALI KHAN, and ARBAB SALIM, aided and abetted by and aiding and abetting each other, fraudulently and knowingly imported and brought into the United States, and caused to be imported and brought into the United States, merchandise contrary to law, and received, concealed, bought, sold, and facilitated the transportation,

concealment, and sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law.

Count	Name	Imported on or about	From/to	Misbranded under	Falsely declared as
8	Zhen Gongfu (drug)	April 18, 2013	China/Mailbox #233 (¶ 16.a)	21 U.S.C. §§ 352(c) and (f)	"Beauty products"
9	Hard Ten Days (drug)	April 24, 2013	China/Mailbox #307 (¶ 19.a)	21 U.S.C. §§ 352(c) and (f)	"Pottery"

All in violation of Title 18, United States Code, Sections 545 and 2.

Counts 10 and 11

Title 18, United States Code, Section 545

Illegal importation

43. Paragraphs 1-32 of this indictment and realleged and incorporated by reference in this count.

44. On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants, ISMAIL ALI KHAN, AHMED ALI KHAN, ARBAB SALIM, and HARDIK KUMAR DESAI, aided and abetted by and aiding and abetting each other, fraudulently and knowingly imported and brought into the United States, and caused to be imported and brought into the United States, merchandise contrary to law, and received, concealed, bought, sold, and facilitated the transportation, concealment, and sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law.

Count	Name	Imported on or about	From/to	Misbranded under	Falsely declared as
10	Herb Viagra (drug)	October 23, 2013	China/Mailbox #220 (§25.b)	21 U.S.C. §§ 352(c) and (f)	"Tea"
11	Herb Viagra (drug)	November 6, 2013	China/Mailbox #472 (§ 24.c)	21 U.S.C. §§ 352(c) and (f)	"Tea"

All in violation of Title 18, United States Code, Sections 545 and 2.

Count 12

Title 18, United States Code, Section 1425(a) False Statement During Interview for Naturalization

On or about August 13, 2013, in the Northern District of Georgia, the defendant, ARBAB SALIM, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered in his interview for Naturalization that he had not ever committed a crime or offense for which he had not been arrested, knowing full well at the time that he had committed crimes as alleged in Counts 1, 3, 4, 8, and 9 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 13

Title 18, United States Code, Section 1425(a) False Statement During Interview for Naturalization

On or about August 13, 2013, in the Northern District of Georgia, the defendant, ARBAB SALIM, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered in his interview for Naturalization that he had not ever given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal, knowing full well at the time that he had given false and misleading information to U.S. government

officials as outlined in Count 12 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 14

Title 18, United States Code, Section 1425(a)
False Statement Prior to Naturalization Ceremony

On or about August 29, 2013, in the Northern District of Georgia, the defendant, ARBAB SALIM, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered on his Notice of Naturalization Oath Ceremony that since his interview he had not committed a crime or offense for which he had not been arrested, knowing full well at the time that he had committed crimes as alleged in Counts 1, 3, 4, 8, and 9 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 15

Title 18, United States Code, Section 1425(a)
False Statement Prior to Naturalization Ceremony

On or about August 29, 2013, in the Northern District of Georgia, the defendant, ARBAB SALIM, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered on his Notice of Naturalization Oath Ceremony that since his interview he had not given false testimony to obtain immigration benefits, knowing full well at the time that he had given false testimony to U.S. government officials as outlined in Count 14 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 16

Title 18, United States Code, Section 1425(a)
False Statement in Application for Naturalization

On or about August 12, 2013, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely stated on his Application for Naturalization that he had not ever committed a crime or offense for which he had not been arrested, knowing full well at the time that he had committed crimes as alleged in Counts 1, 2, 3, 4, 7, 8, and 9 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 17

Title 18, United States Code, Section 1425(a)
False Statement in Application for Naturalization

On or about August 12, 2013, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely stated on his Application for Naturalization that he had not ever given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal, knowing full well at the time that he had given false and misleading information to United States government officials as outlined in Count 16 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 18

Title 18, United States Code, Section 1425(a)
False Statement During Interview for Naturalization

On or about January 6, 2014, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered in his interview for Naturalization that he had not ever committed a crime or offense for which he had not been arrested, knowing full well at the time that he had committed crimes as alleged in Counts 1 through 11 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 19

Title 18, United States Code, Section 1425(a)
False Statement During Interview for Naturalization

On or about January 6, 2014, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered in his interview for Naturalization that he had not ever given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal, knowing full well at the time that he had given false and misleading information to U.S. government officials as outlined in Count 18 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 20

Title 18, United States Code, Section 1425(a)
False Statement Prior to Naturalization Ceremony

On or about March 14, 2014, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered on his Notice of Naturalization Oath Ceremony that since his interview he had not committed a crime or offense for which he had not been arrested, knowing full well at the time that he had committed crimes as alleged in Counts 1 through 11 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Count 21

Title 18, United States Code, Section 1425(a)
False Statement Prior to Naturalization Ceremony

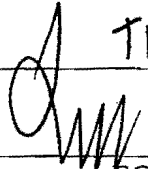
On or about March 14, 2014, in the Northern District of Georgia, the defendant, ISMAIL ALI KAHN, did knowingly procure and attempt to procure naturalization for himself, contrary to law, when he falsely answered on his Notice of Naturalization Oath Ceremony that since his interview he had not given false testimony to obtain immigration benefits, knowing full well at the time that he had given false testimony to U.S. government officials as outlined in Count 20 of this Indictment, in violation of Title 18, United States Code, Section 1425(a).

Forfeiture


Upon conviction of offenses alleged in Counts 1 and 7-11 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Sections 982(a)(2)(B), and 545, any property constituting, or derived

from, proceeds obtained, directly or indirectly, as a result of said violations, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, and any merchandise introduced into the United States in violation of Title 18, United States Code, Section 545, or the value thereof.

The United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property or seek a money judgment against said defendants for any amount that would constitute the proceeds of such violation(s).

A TRUE BILL

 FOREPERSON

SALLY QUILLIAN YATES
United States Attorney


 WILLIAM L. MCKINNON, JR.
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